

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

_____)
_____)
ROYAL INDEMNITY COMPANY,)
_____)
Plaintiff,)
_____)
v.) C.A. No. 05-165-JJF
_____)
PEPPER HAMILTON LLP, W. RODERICK)
GAGNE', FREED MAXICK & BATTAGLIA)
CPAs, McGLADREY & PULLEN LLP, and)
MICHAEL AQUINO,)
_____)
Defendants.)
_____)
_____)
CHARLES A. STANZIALE, JR.,)
Chapter 7 Trustee of Student Finance)
Corporation,)
_____)
Plaintiff,)
_____)
v.) C.A. No. 05-72-JJF
_____)
_____)
McGLADREY & PULLEN LLP and)
MICHAEL AQUINO,)
_____)
Defendants.)
_____)
_____)
CHARLES A. STANZIALE, JR.,)
Chapter 7 Trustee of Student Finance)
Corporation,)
_____)
Plaintiff,)
_____)
v.) C.A. No. 04-1551-JJF
_____)
_____)
PEPPER HAMILTON LLP, et al.,)
_____)
Defendants.)
_____)

MBIA INSURANCE CORPORATION and)
WELLS FARGO BANK, N.A. (f/k/a WELLS)
FARGO BANK MINNESOTA N.A.) as)
TRUSTEE OF SFC GRANTOR TRUST,)
SERIES 2000-1, SFC GRANTOR TRUST,)
SERIES 2000-2, SFC GRANTOR TRUST,)
SERIES 2000-3, SFC GRANTOR TRUST,) C.A. No. 02-1294-JJF
SERIES 2000-4, SFC GRANTOR TRUST,)
SERIES 2001-1, SFC GRANTOR TRUST,)
SERIES 2001-2, SFC OWNER TRUST 2001-I,)
AND SFC GRANTOR TRUST, SERIES 2001-3,)
)
Plaintiffs/Counterclaim Defendants,)
)
v.)
)
ROYAL INDEMNITY COMPANY,)
)
Defendant/Counterclaim Plaintiff.)
)

PLAINTIFF ROYAL INDEMNITY COMPANY'S MOTION TO COMPEL

For the reasons more fully set forth in the accompanying memorandum, Royal Indemnity Company (“Royal”) hereby moves to compel the 30(b)(6) deposition of MBIA Insurance Corporation (“MBIA”), a non-party witness in these actions. In compliance with D. Del. LR 7.1.1, Royal has made a reasonable effort to reach agreement with respect to the subject matter of this motion but was unable to do so.

Dated: May 25, 2007

Respectfully submitted,

ASHBY & GEDDES



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